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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Preparation for International)
Telecommunication Union World)
Radiocommunication Conferences)

ET Docket No. 93-198

To: The Commission

**REPLY COMMENTS OF
THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED**

The American Radio Relay League, Incorporated (the League), the national association of amateur radio operators in the United States, by counsel and pursuant to §1.415 of the Commission's Rules (47 C.F.R. §1.415), hereby respectfully submits its reply to those comments filed in response to the Notice of Inquiry, FCC No. 93-328, 58 Fed. Reg. 36630, released June 28, 1993 (the Notice). In response to certain of the comments filed in this proceeding, the League states as follows:

I. 7 MHz Realignment

1. George Jacobs & Associates, Inc., on page 5 of its comments, made reference to the 7 MHz realignment proposed at, but not adopted by, WARC-92. The recommendation (Recommendation 718 at WARC-92) could benefit both the broadcasting and amateur services. The League reaffirms the need to solve the long-standing interference problem between these two services at a future

WARC-92, which would reduce the Region 3 amateur allocation of 300 kHz to 200 kHz or any other allocation less than 300 kHz, would be unacceptable to radio amateurs in Region 2, including the United States, and should and will be vigorously opposed. The League also believes that the broadcasting service would not realize its objective of expanding its allocation around 7 MHz if considered at a conference in 1995 or 1997, as there will have been insufficient time for the national positions developed before and during WARC 92 to have changed, a necessary condition in order to make further considerations of the matter worthwhile.

3. In view of the foregoing, the League suggests that both the amateur and broadcasting services would have a far better chance of achieving their mutual objectives by deferring consideration of

II. Conference Preparation

5. The comments of Aeronautical Radio, Inc. (ARINC) urged the creation by the Commission of a permanent working group involving members of the industry, to cooperatively develop proposals for future World Radiocommunications Conferences. The League views this as a useful step, similar to procedures for planning for prior World Administration Radio Conferences, in which the League has participated at numerous times in the past. ARINC, at page 6 of its comments, stated:

ARINC submits that the Commission should establish a permanent Working Group on World Radiocommunications Conferences to work with the Commission staff in the development of proposals. This permanent working group would be supplemented by public comment in responses to Notices of Inquiry, but the development time for proposals would be reduced by having a broadly representative body in place that could assist the Commission in developing the U.S. positions. The establishment of a permanent working group would avoid the loss of time involved in recreating the group for each conference.

The League concurs in the need to involve the private sector in the planning of U.S. proposals and positions relative to future World Radiocommunication Conferences earlier in the process than previously. The establishment of such a working group on a permanent basis is appropriate also in that it provides recognition

acceptance of this concept and urges that it be implemented as soon as possible.

III. Conclusion

6. The League respectfully requests that the realignment of amateur and broadcasting allocations at 7 MHz be deferred for consideration at a future conference competent to deal with HF allocations. Further, the League urges the establishment of a permanent U.S. World Radiocommunication Conference preparation process involving the private sector at an early date.

Therefore, the foregoing considered, the American Radio Relay League, incorporated respectfully requests that the Commission take into account the League's comments and these reply comments when

CERTIFICATE OF SERVICE

I, Margaret A. Ford, Office Manager of the law firm of Booth, Freret & Imlay, do certify that copies of the foregoing REPLY COMMENTS OF THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED were mailed via U. S. Mail, postage prepaid, first class, this 29th day of July, 1993, to the offices of the following:

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